

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**CASE NO: 0:22-CV-61553-WPD**

**CRUZ VALDIVIESO FIGUERA,**

Plaintiff,

vs.

**ALL VIP CARE, INC., &  
LIZ VELAZQUEZ McKINNON,**

Defendants.

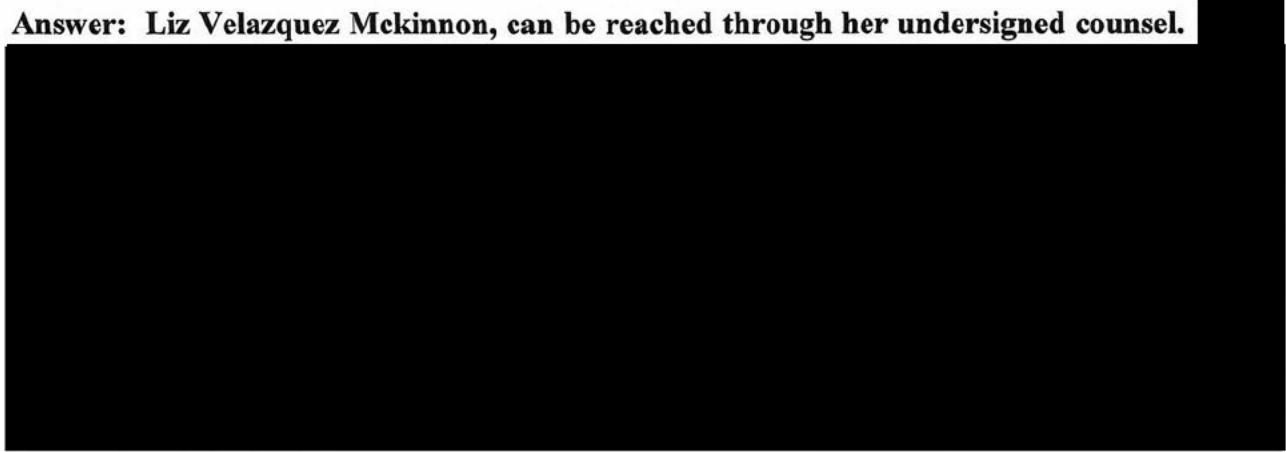
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**DEFENDANTS' ANSWER TO PLAINTIFF'S INTERROGATORIES PROPOUNDED  
UPON DEFENDANT MCKINNON**

The Defendants in accordance with Fed. R. Civ. P. 33 and Local Rule 26.1, et al., file this Answers to the Plaintiff's Request for Interrogatories propounded on November 11, 2022; and in support thereof states:

1) Please state your full name, all aliases and names which you have been known by, all addresses at which you lived during the past five years, your date of birth, and your social security number:

**Answer: Liz Velazquez Mckinnon, can be reached through her undersigned counsel.**



2) Please state whether you have ever been charged with a crime and, if so, please state the nature of each such charge, the County and State in which each was brought, the disposition of each such charge, and the case number(s) for each:

**Answer: No**

3) Please identify by name, address and telephone number, any person who has or may have knowledge of any relevant facts or discoverable matter relating to the subject of this lawsuit, including the claims and defenses asserted, and state the substance of the knowledge that you believe or have reason to believe each of these persons may have.

**Answer: Liz Velazquez Mckinnon, owner and Chief Executive Officer and Diana Ramirez, the Broward area administrator. Both are available through Defendant counsel.**

4) Identify your position with All VIP and describe your daily activities for All VIP from March 1, 2020, to August 15, 2022:

**Answer: Owner and Chief Executive Office.** [REDACTED]

5) If you contend that you did not supervise, hire, or manage Plaintiff in her work at All VIP, then please identify each person who did by name, address, telephone number, and each such person's position with All VIP during this same timeframe, and then each such person's current employment/work status with All VIP.

**Answer: The HHA, like the Plaintiff are hired, fired, and supervised by the Client and AHCA, not the Defendants. The Defendants administer the payment of the HHA based on the timesheets submitted by the HHA and authorized and approved by the Client.**

6) Please identify each contract, lease, and agreement that you signed on behalf of All VIP during the past five (5) years and the current custodian of each such document.

7) Please identify your role in processing payroll/payments to Home Health Aides, signing checks, as well as hiring and firing decisions on behalf of All VIP during the three years prior to the filing of the Complaint in this case.

**Answer: As CEO I am responsible for oversight and administration of all payroll obligations of VIP.**

8) Please state if you have ever been named as a Plaintiff, Defendant, or witness in a lawsuit and, if so, then please state the nature of the claim, identify whether you were a Plaintiff, Defendant, or witness, whether you gave a deposition, the case number and jurisdiction of each such claim, and the outcome.

**Answer: None as it relates to the subject matter similar to this present action.**

9) Please identify all conversations you had with Plaintiff regarding her hiring and her pay during the past three years:

**Answer: None recalled at this time. The on boarding documents speak for themselves as the issues asked.**

10) Please identify each bank account for All VIP of which you are a signatory and identify each other signatory during the time period during which Plaintiff worked for Defendants:

**CERTIFICATIONS**

I hereby certify that a copy of this document was provided to: **Brian Howard Pollock, Esquire**, Fairlaw Firm, 135 San Lorenzo, Avenue, Suite 770, Coral Gables, FL 33146, [Brian@fairlawattorney.com](mailto:Brian@fairlawattorney.com); **Toussaint Marcus Cummings, Esquire**, Quintairos, Prieto, Wood, and Boyer, 9300 South Dadeland Blvd, 4<sup>th</sup> Floor, Miami, FL 33156, [toussaint@fairlawattorney.com](mailto:toussaint@fairlawattorney.com), by email on **January 19, 2023**.

/s/ RANDY M. GOLDBERG, ESQUIRE

Florida Healthcare Law Firm

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Delray Beach, FL 33444

754-224-0867

RMGEsquire@gmail.com

Randy@Randygoldberglaw.com

Interrogatory Jurat

By: /s/

Liz Velazquez McKinnon

Name: Liz Velazquez McKinnon

State of Florida

County of Palm Beach

Sworn to and subscribed before me by means of  physical presence or  on-line notarization this 18<sup>th</sup> day of January, 2023, by Liz Velazquez McKinnon personally or  as an authorized agent for All VIP Care, Inc.

By: Diana Ramirez

Notary Public, State of Florida

1-18-2023

Personally Known to Me or

Produced \_\_\_\_\_ as identification.

